

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SUSAN WATERS,

)

Plaintiff,

)

Civil Action No. 03-12480 NG

vs.

)

Magistrate Judge Cohen

PHILIPS MEDICAL SYSTEMS, N.A., INC.,

)

Defendant.

)

FILING FEE PAID:

RECEIPT # 55592AMOUNT \$ 50.00

BY DPTY CLK

DATE 4/29/04

**ASSENTED TO MOTION FOR ADMISSION PRO HAC VICE
OF MICHAEL R. PHILLIPS**

Pursuant to Local Rule 83.5.3(b), Defendant Philips Medical Systems North America (“Philips Medical”) by and through its counsel moves that the Court admit Michael R. Phillips of the law firm of McGuireWoods LLP, 150 North Michigan Avenue, Suite 2500, Chicago, IL 60601-7567 to represent Philips Medical in connection with the above-captioned action. In support of this motion Philips Medical states as follows:

1. Counsel for Philips Medical, David M. Cogliano of Schwartz Hannum PC, 11 Chestnut Street, Andover, Massachusetts 01810 has been admitted to practice before this Court since 1996. At all times, David M. Cogliano has been a member of good standing of the bar of this Court.
2. As set forth in the certificate of Michael R. Phillips, attached hereto as Exhibit A, Mr. Phillips is a member in good standing of the Bar of the State of Illinois and is admitted to practice in all the Courts of the State of Illinois, and the United States District Court for the Northern District of Illinois.

3. Mr. Phillips has never been the subject of any disciplinary proceedings in any jurisdiction where he has been admitted to practice.

4. Good cause exists for the admission of Mr. Phillips. Mr. Phillips has represented Philips Medical in a variety of employment-related matters throughout the country.

5. Mr. Phillips has developed particular technical and legal expertise relating to the relevant facts and legal issues involved in this case.

6. Mr. Phillips has reviewed the Local Rules for the United States District Court for the District of Massachusetts and will comply with said Rules, including the Rules of Professional Conduct regulating the practice of law.

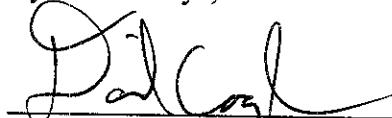
7. Either David M. Cogliano or another attorney from Schwartz Hannum PC will be present at all proceedings and sign all pleadings, briefs and other papers filed with the Court to the extent the Court so requires and will assume full responsibility for the conduct of Mr. Phillips in connection with the above-captioned action.

8. Counsel for Susan Waters has represented to Mr. Cogliano that he does not oppose this Motion.

WHEREFORE, Philips Medical hereby requests that Michael R. Phillips of McGuire Woods LLP be admitted pro hac vice, to appear on behalf of Philips Medical

Dated: April 26, 2004

By its attorneys,



David M. Cogliano (BBO #630158)
SCHWARTZ HANNUM PC
11 Chestnut Street
Andover, MA 01810
(978) 623-0900

- and -

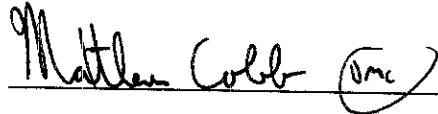
OF COUNSEL:

Michael R. Phillips
MC GUIREWOODS LLP
150 North Michigan Avenue, Suite 2500
Chicago, Illinois 60601-7567
(312) 558-1000

Dated: April 26, 2004

Susan Waters

By her attorney,

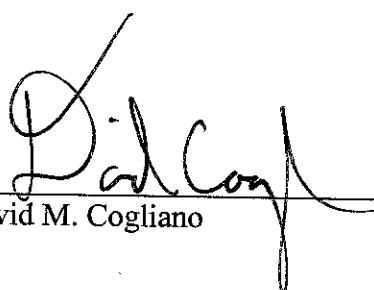


Matthew Cobb (mc)

CERTIFICATE OF SERVICE

I, David M. Cogliano, an attorney, certify that I caused a copy of the foregoing *Assented to Motion for Admission Pro Hac Vice of Michael R. Phillips*, to be served upon the following individual, by depositing a copy of the same in the U.S. mail at 11 Chestnut Street, Andover, Massachusetts, on the 28th day of April 2004:

Matthew Cobb, Esq.
Law Offices of Matthew Cobb
101 Tremont Street
Boston, Massachusetts 02108



David M. Cogliano